

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

<b>DAVID ROBERT THOMPSON</b>	<b>: CHAPTER 11</b>
<b>a/k/a DAVE ROBERT THOMPSON</b>	<b>:</b>
<b>DENISE PEARL THOMPSON</b>	<b>: CASE NO. 1:18-bk-00449 RNO</b>
<b>Debtors</b>	<b>:</b>

**APPLICATION OF DEBTORS-IN-POSSESSION TO EMPLOY COUNSEL**

**AND NOW**, come Debtors, David Robert Thompson, aka Dave Robert Thompson and Denise Pearl Thompson, makes this application, respectfully stating in support thereof:

1. Debtors filed a voluntary Chapter 13 petition with this Court on February 2, 2018. The Debtor consulted with IMBLUM LAW OFFICES, P.C. (Hereinafter "Counsel"), prior to the filing of the Chapter 13 Petition and subsequently.
2. On July 10, 2018, the Debtors have filed a Motion to Convert their case to a Chapter 11.
3. The Debtors desire to continue to use Counsel during the course of the Chapter 11 proceeding, and the case is one necessitating the employment of competent bankruptcy counsel during the course of the Chapter 11 administration.
4. The reasons for the selection of the aforementioned are that the debtors-in-possession have met with Counsel prior to the filing, have discussed the case in general terms as to the financial problems it is experiencing, and believe that Counsel is well qualified and able to successfully handle this proceeding for it.
5. The professional services to be rendered by Counsel are counseling on actions to take during the Chapter 11 administration, preparation of the Scheduled and Statement of Affairs, attending the first meeting of creditors and any other necessary hearings on Motions filed by the

debtors-in-possession or any creditors.

6. The names and hourly rates of all applicants, professionals and para-professionals who bill for time in this matter are as follows:

Gary J. Imblum, Esquire	\$295.00 per hour
Jeffrey L. Troutman, Esquire	\$235.00 per hour
Carol Shay, Paralegal	\$135.00 per hour
Candy Hill, Paralegal	\$135.00 per hour
Bernadette Davis, Paralegal	\$135.00 per hour


Applicant avers that said rate is fair in view of Applicant's experience in the area of Bankruptcy Law.

Plus out-of-pocket costs.

7. To the best of the applicants' knowledge, Counsel has no connection with the debtors-in possession, its creditors, any party in interest, or their respective attorneys or accountants, the office of the United States Trustee or any person employed by it.

**WHEREFORE**, Movant requests that this Honorable Court enter an Order allowing the employment of Counsel as counsel for the debtors-in-possession, effective the date of the filing of the voluntary Chapter 11 Petition.

IMBLUM LAW OFFICES, P.C.



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Gary J. Imblum, Esquire  
Attorney I.D. No. 42606  
4615 Derry Street  
Harrisburg, PA 17111  
(717) 238-5250  
Fax No. (717) 558-8990  
Attorney for Debtors

Dated: 8/16/18

## CERTIFICATE OF SERVICE

I, Carol V. Shay, Paralegal, hereby certify that I have served a copy of the foregoing APPLICATION OF DEBTORS-IN-POSSESSION TO APPOINT COUNSEL on the following person(s) by E-Service or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania addressed to:

UNITED STATES TRUSTEE  
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.

Carol V. Shay

Carol V. Shay, Paralegal  
4615 Derry Street  
Harrisburg PA 17111  
717 238-5250  
Fax No. 717 558-8990

Dated: 8 / 16 / 18